

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to establish the
California Institute for Climate Solutions

Rulemaking 07-09-008

**COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA
ON DRAFT PROPOSED DECISION ESTABLISHING
CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS**

The Consumer Federation of California (“CFC”) files these Comments on the Proposed Decision of Commissioner Peevey (“PD”), mailed February 11, 2008, pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”). CFC respectfully requests the Commission to reject the Proposed Decision which proposes an unlawful levy of a special tax on ratepayers to support an Institute which is not required to invest in projects which benefit ratepayers and which will duplicate research of other state agencies acting pursuant to AB 32.

1. Now is not the time to raise taxes.

The PD proposes not only to fund research, but also to impose special taxes through utility rates for a job development program for prison populations¹, fostering the next generation of researchers,² educating people “who haven’t yet been introduced to the current formal education system like ... the K-12 school systems,”³ “behavioral modification,”⁴ and developing new industries or re-tooling existing industries.⁵ These

¹ PD at 23, 43

² PD at 41

³ PD at 41.

⁴ PD at 42. As much as 15% of the budget (\$90 million) may be spent on education and workforce training. PD at 24.

⁵ PD at 26.

expenditures by the proposed Climate Institute are not “cognate and germane to the regulation of public utilities.” *So. Calif. Gas. Co. v. Pub. Util. Comm’n* (1979) 24 Cal. 3d 653, 656.

The Climate Action Team, which is responsible for “coordinating overall climate policy” in California, pursuant to Health & Safety Code § 38501(g) references, in a draft report to the Governor and Legislature, several early actions the Public Utilities Commission is expected to take (at some cost to ratepayers) to combat global warming: IOU Energy Efficiency Programs; Accelerated Renewable Portfolio Standard (RPS); California solar Initiative (\$2.8 billion); Transmission infrastructure (\$3 billion); Water Energy Issues; Water Conservation; additional RPS & RECs; SB1368 integrated gasification combined cycle (IGCC) and/or carbon capture generation.⁶ Presumably, the Climate Action Team has determined which part of the state’s effort to combat global warming should, and may lawfully, be charged to ratepayers. There is no mention of the Climate Institute in the Team’s report.

The appropriation from ratepayers of more than a half billion dollars⁷ that would otherwise be spent supporting their families, paying for health care and insurance, housing, groceries and gasoline, is unfair and without legal authority. The economy is in a recession, workers are being laid off, mortgage loans are being foreclosed, and assistance is being cut due to state budget shortfalls. This is not a good time to be adding special taxes to utility bills.

⁶ http://www.climatechange.ca.gov/climate_action_team/reports/index.html.

⁷ The 10 year commitment is \$600 million, but it is possible, given USC’s escalation proposal (PD at 18), that more may be spent. It is up to the Governing Board to control expenditures (PD at 28) which has no ratepayer representative independent of the Commission. And the PD suggests that “[t]he terms and requirements of the grant of ratepayer funds can be modified by an subsequent Commission decision. PD at 44.

2. A 10-year commitment of ratepayer funds will drive large users to alternative suppliers and leave the debt to be paid by captive customers.

The plight of California workers faced with higher utility bills, which are already among the highest in the nation,⁸ will be exacerbated by current efforts to restructure the electric industry and develop “a more functional competitive electricity market.”⁹ California businesses are complaining that the imposition of current taxes on utility bills makes them less competitive with businesses in other states. D.05-09-018 at 9. PG&E has signed up nine economic development rate (EDR) customers and SCE has signed up 15 EDR customers, who have sworn that “but for the receipt of the discounted economic development rate ..., the Applicant’s load would not have been located, added or retained within California.”¹⁰ More applications are being processed.¹¹

California commercial customers are pushing for a competitive generation market (R.05-12-013) and the right to buy electricity at a cheaper price through the reinstitution of direct access (R.07-05-025). As soon as these business customers can buy from other energy suppliers, they will and, if permitted, will abandon or shift to those who are left on the utility’s system, the cost of the Climate Institute, public purpose programs, the solar initiative, energy efficiency and other well-motivated programs. Utilities are already responding to this movement by attempting to reduce collections of the public purpose charge (A.04-04-008 & A-07-12-006) and by shifting costs to residential and small commercial customers (SCE’s A.L. # 2212-E), as they propose with Climate Institute costs. The imposition of additional taxes on utility bills is not compatible with the

⁸ California’s average electric rate for all sectors (13.57¢/kWh) is the 6th highest rate in the country.

⁹ R.08-02-007 OIR at A-5.

¹⁰ PG&E’s 2007 Report on EDR Applicants, and SCE’s Public Annual Report in Compliance with D.05-09-018, filed Feb. 15, 2008

¹¹ *Id.*

movement to a competitive marketplace.

3. There is no guarantee that the more than half billion dollars to be raised for the Climate Institute will be spent on projects which will benefit ratepayers.

The PD has done very little to restrict spending of ratepayer dollars to research projects which will benefit ratepayers. The PD explicitly states the Commission will not, “in this decision, prescribe any specific areas of research.”¹²

“We are hesitant to be overly prescriptive with regards to the allocation of funds since the Institute’s specific priorities should be established through the Roadmapping and strategic planning processes.”¹³

The PD does not even require that research be spent on projects which will benefit ratepayers: “We decline to adopt a rigid notion of ratepayer benefit as some parties propose. ... Nonetheless we agree that there should be a strong **preference** for research that is relevant to ratepayers.”¹⁴

The PD admits there is no real promise of benefits to ratepayers: “[W]e cannot precisely determine the potential return for ratepayers at this time.”¹⁵

[A]ny effort to calculate the total monetary benefits ... would be highly speculative. ... We can identify the likely sources of those benefits ... Again, precisely quantifying these benefits is difficult and necessarily speculative.”¹⁶

As the PD recognizes, the product of the Climate Institute’s research will benefit Californians, as a whole, not just ratepayers. “The causes and cures for climate change cannot be segregated on a sector by sector or industry by industry basis. ... [T]he primary benefit to be gained is “a stream of commercially deployable technologies that

¹² PD at 9.
¹³ PD at 21.
¹⁴ PD at 16.
¹⁵ PD at 11.
¹⁶ PD at 10.

will reduce GHG emissions or help California adapt to the impacts.”¹⁷ This finding leads to the inevitable conclusion that the Climate Institute should be financed by the public, not the customers of investor-owned utilities.

4. The only putative benefit to ratepayers has been given to universities.

Any revenues from the licensing of intellectual property will not be returned to ratepayers. Instead, this revenue stream has been deeded to the universities, through the Commission’s requirement that “all grant agreements shall be consistent with the framework established by the federal Bayh-Dole Act, 35 U.S.C. 200-212. The Bayh-Dole Act applies only to inventions which are federally funded, and thus, would only come into play if a grant given by the Climate Institute included federal funds. There is no reason to give universities the right to retain title to and exclusively license technologies developed under grants which do not include federal funds. And by doing so, the PD deprives ratepayers of the benefit of funding new technologies. Under the terms of the Bayh-Dole Act, all royalties must be paid to the inventor or re-invested in research.

5. Ratepayers will have virtually no input in the process of deciding how their money is spent.

While all of the money to be spent by the Institute comes from ratepayers, only one seat on the 21-member Governing Board of the Climate Institute, which decides how funds will be spent, will be held by a ratepayer representative.¹⁸ Other seats will be held by CPUC commissioners (2), university faculty and administrators (7) and “a

¹⁷ PD at 16.

¹⁸ The ratepayer’s representative is the Director of DRA or her designee. PD at 28-29. The PD suggests three other representatives are guardians of the ratepayer interest, two Commissioners and a

California-based national laboratory” (1), a utility and an energy company (2), state agencies (2) and a public representative (1), an agricultural representative (1), a minority/low-income representative (1), an environmental representative (1) and a venture capitalist (1).¹⁹ Essentially, the PD would require the appropriation of \$600 million of ratepayer funds for others to spend, including colleges and universities, through an involuntary levy which the Commission, itself, refused to approve 40 years ago, with California Supreme Court approval. *Pacific Tele. & Tele. Co. v. Pub. Util. Comm’n* (1965) 62 Cal. 2d 634, 668.

6. The Commission would retain no control over expenditures of ratepayer capital.

The PD proposes that the Commission delegate the decision about how to spend the money to a “Roadmapping” process on which the PD admits to being somewhat unclear, and asks for further explanation.²⁰ The PD provides no clear standards to “guide the Institute staff” or “inform the entire grant administration process.”²¹ Instead, it tasks the Strategic Research Committee (SRC) with “identify[ing] areas where GHG emissions can be reduced, technological, economic, or policy barriers that may presently exist, and what additional research and educational activities are needed to overcome those barriers.”²² A Roadmap to be developed by SRC will determine the direction and scope of the Institute’s research, and the final decision on grants will be made by the Governing Board, upon recommendations by the Institute Director.²³ That

representative from an IOU. PD at 44.

¹⁹ PD at 29.

²⁰ PD at 33-34, 35. Roadmapping is a word of many meanings. See e.g., http://en.wikipedia.org/wiki/Technology_roadmap#The_context_of_product_management

²¹ PD at 16-17.

²² PD at 34.

²³ PD at 32-33.

is a very broad delegation of authority, much too broad.

The PD explicitly rejects the creation of “redundant and burdensome requirements that impose the Commission’s authority on the day to day operations of the Institute.”²⁴ The Commission’s role will be to ask questions and give “feedback”, but not approval.²⁵ Annual reports will be created internally and posted on the Institute’s website ²⁶ and a biennial performance review is to be submitted “to the Commission’s executive director for posting on the public website.”²⁷

It is unclear how much time and attention will be devoted to these reviews. The budget for administrative and strategic planning expenditures is capped at 10 percent²⁸ and will also have to cover other tasks expected of Climate Institute staff, e.g., conduct an inventory of current publicly funded research efforts, prepare a roadmap, compile a ratepayer benefit index, develop short term and long term strategic plans, conduct peer reviews, update the Roadmap annually,²⁹ conduct a statewide search for appointees to the Workforce Training and Education Committee who will, at the expense of the Climate Institute, identify education and training needs, targeting underserved and disadvantage communities, and prepare a strategic plan and recommend policies and programs to address those needs, and develop a sustainable energy curriculum for educational institutions.³⁰

²⁴ PD at 44.

²⁵ PD at 17.

²⁶ PD at 45-46.

²⁷ PD at 44-45, 47.

²⁸ PD at 24

²⁹ PD at 32. Under the terms of a Facilities and Administration Agreement entered into by UC and the Federal government, the indirect cost rate for on-campus research increased to **53** percent on July 1, 2007 and to 53.5 percent on July 1, 2009. <http://news-rac.berkeley.edu/2007/08/new-facilities-and->

7. There is a strong likelihood that taxes on utility bills will be used on projects which will duplicate spending of the Air Resources Board.

The PD recognizes that without “narrowly defining the scope of potential research,” which it refuses to do because of a fear that it “would likely hurt the ability of the institute to attract non-ratepayer funding,”³¹ there is a real potential for wasted expenditures: “The Commission is mindful that redundancy in research could result in unnecessary ratepayer and taxpayer expenditure.”³² To avoid redundancy, it directs the SRC to make a comprehensive inventory of current climate change related research and educational activity, “a task which is, itself, redundant.

As noted in the 2007 Climate Action Team’s draft report to the Governor and Legislature, “The California Air Resources Board, under the California Global Warming Solutions Act of 2006 (Section 38560.5 of the Health and Safety Code) has the primary responsibility for reducing Greenhouse Gas Emissions.”³³ AB 32 required the California Air Resources Board (“CARB”) to develop a “scoping plan ... for achieving the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions from sources or categories of sources of greenhouse gases by 2020.”³⁴ As part of this process CARB is to consult “with all state agencies with jurisdiction over sources of greenhouse gases,” including the PUC, about “all elements of its plan that pertain to energy related matters including, but not limited to, electrical generation, ... the provision of reliable and affordable electrical service, ... and statewide fuel

administrative-cost.html

³⁰ PD at 42-43

³¹ PD at 12.

³² PD at 8.

³³ <http://www.climatechange.ca.gov/documents/index.html>: Climate Action TEAM and ARB Reports: “Climate Action Team Proposed Early Actions to Mitigate Climate Change in California” (2007)

³⁴ CA Health & Safety Code § 38561

supplies.”³⁵ It is clear that the Legislature intended that any undertaking by the PUC be part of the overall scoping process directed by CARB.

AB 32 specifically directs CARB to fund the same projects the PD anticipates the Climate Institute will fund, *i.e.*, “technologies that improve efficiency” and “contribute to reductions of GHG emissions.”³⁶ The PD states that:

“The Institute will provide significant benefit to ratepayers by accelerating applied research and development (R&D) of practical and commercially viable technologies that will reduce greenhouse gas emissions”³⁷

AB 32 directs CARB to appoint an Economic and Technology Advancement Advisory Committee:

to advise the state board on activities that will facilitate investment in and implementation of technological research and development opportunities ... that will assist in the reduction of greenhouse gas emissions.”³⁸

A 2007 draft report of the California Air Resources Board (“CARB”) specifically lists a “Technology grant program for reducing GHGs” (B-39) as under consideration.³⁹

The PD attempts to distinguish Climate Institute projects from those to be undertaken by the state, by pointing out that “[t]here is currently no centralized statewide directed R&D and training plan.”⁴⁰ But there will be, and statewide R&D efforts will be taking place during the same 10-year period the Climate Institute is giving out grants. Further, as the PD notes, the PIER Program annually awards up to \$62 million to conduct public interest energy research and brings new energy services and

³⁵ Health & Safety Code § 38561 (*emphasis added* The PD attempts to minimize the apparent duplication by having the Commission state, “We are not aware, however of any effort identical to that envisioned for the Roadmap that has been completed at this time.” PD at 35. Not completed, perhaps, but underway and contemporary with.

³⁶ PD at 3, 10.

³⁷ PD at 2.

³⁸ Health & Safety Code § 38591(d).

³⁹ <http://www.climatechange.ca.gov/documents/index.html>: Climate Action Team and ARB Reports: “Proposed Early Actions to Mitigate Climate Change In California” (Apr. 20, 2007)

products to the marketplace.⁴¹ The fate of future spending through PIER grants is in the hands of the legislature which is as likely to authorize continued spending, as not.⁴²

The Legislature has clearly and expressly manifested its intent to occupy the field of greenhouse gas emission control, under the umbrella of another state agency. The Commission's creation and funding of the Climate Institute is preempted. See e.g., *Fiscal v. City and County of San Francisco* (2008) 158 Cal. App. 4th 895, 903-904.

CONCLUSION

As stated in Comments filed November 2, 2007, the Consumer Federation of California understands the critical importance of addressing the issue of climate change, but believes the level of appropriation of public funds to be devoted to this effort is a decision that should be made by the legislature and the Governor, not by the Public Utilities Commission. Ratepayers are already contributing to the state's efforts to reduce greenhouse gas emissions through the financing of energy efficiency measures, installation of distributed generation including solar power, purchases of renewable generation and the construction of transmission necessary to bring renewable energy resources to Californians. The assessment of an additional tax to fund creation of the Climate Institute and to supply grants to researchers at the state's colleges and universities is one tax too many, particularly during a period of recession and in the midst of a movement toward a competitive market for electricity.

The PD offers no promise of benefits to ratepayers, only benefits to the state as a whole. The research and development contemplated by the PD is being funded by the

⁴⁰ PD at 34

⁴¹ PD at 7; <http://www.energy.ca.gov/pier/>

⁴² The PD improperly speculates that public funding of energy R&D may return to its 1994 level when the program sunsets in 2011.

State, pursuant to AB 32, as it should be. There is no reason to further tax ratepayers to undertake a duplicative effort.

Dated this 29th day of February, 2008

CONSUMER FEDERATION OF CALIFORNIA

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2008, I served by e-mail all parties on the service list of R.07-09-008, true copies of the original of the following document which is attached hereto:

**COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA
ON DRAFT PROPOSED DECISION ESTABLISHING
CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS**

The names and e-mail addresses of parties served by e-mail are shown on an attachment.

Dated: February 29, 2008

Respectfully submitted,

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